

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

10/12/2022

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SIMILARITY MEMORANDUM:

Subject: EPA Reg. No.: 82633-IN/Sharda Lambda-Cyhalothrin Technical
Decision #: 577182
DP #: 463825
PC Code: 128897 (lambda-cyhalothrin)
PRIA code: R333

From: Marianne Lewis, Biologist
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Applicant: Sharda Cropchem Ltd
c/o Wagner Regulatory Associates, Inc.
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FORMULATION FROM EPA Reg. No. 82633-IN LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Lambda-cyhalothrin:	97.9%
<u>Inert Ingredient(s):</u>	<u>2.1%</u>
Total	100.0%

BACKGROUND: The registrant has submitted a new 97.9% lambda-cyhalothrin technical, EPA Reg. No. 82633-IN, and is claiming that it is substantially similar to EPA Reg. No. 74530-23 (97.9% lambda-cyhalothrin). The MRID's supporting the EPA Reg. No. 74530-23 are as follows: 471701-10 (acute oral/870.1100), 471701-11 (acute dermal/870.1200), 471701-12 (acute inhalation/870.1300), 471701-13 (primary eye irritation/870.2400), 471701-14 (primary skin irritation/870.2500), and 471701-15 (skin sensitization/870.2600). These studies were reviewed and five were found to be acceptable by B.Backus, CITAB/RD on 4/11/08 (D# 380894, DP# 343744). The skin sensitization study was found to be unacceptable in that review. However, the PM team classified EPA Reg. No. 74530-23 as a skin sensitizer and gave the registrant the option to submit another skin sensitization study if they disagreed with this classification. That registrant has not provided a new skin sensitization study to date. Therefore, since the registrant is claiming their product is substantially similar to the EPA Reg. No. 74530-23 the subject product will also be classified as a skin sensitizer.

The Basic CSF for 82633-IN (dated 5/23/22) was compared to the Basic CSF for 74530-23 (dated 6/28/07). It was determined that the two formulas are substantially similar.

RECOMMENDATIONS:

- The five acceptable acute toxicity studies used to register EPA Reg. No. 74530-23 are acceptable to support the registration of EPA Reg. No. 82633-IN.
- The subject product will also be classified as a skin sensitizer.

The acute toxicity profile for EPA Reg. No. 82633-IN is currently:

acute oral toxicity	II	cited	MRID 471701-10
acute dermal toxicity	III	cited	MRID 471701-11
acute inhalation toxicity	II	cited	MRID 471701-12
primary eye irritation	IV	cited	MRID 471701-13
primary skin irritation	IV	cited	MRID 471701-14
dermal sensitization	skin sensitizer	Unacceptable	MRID 471701-15

The proposed Basic CSF (dated 5/23/22) submitted for 82633-IN must be reviewed and accepted by the product chemists in the Chemistry, Inerts and Toxicology Assessment Branch.

LABELING:

ID #: 82633-IN SHARDA LAMBDA-CYHALOTHRIN TECHNICAL

SIGNAL WORD: WARNING

FIRST AID

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

*The label has the If in eyes first aid statement which is acceptable but the order of the first aid statements needs to be: If swallowed, If inhaled, If on skin or clothing and then If in eyes.

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Maybe fatal if swallowed. May be fatal if inhaled. Do not breathe dust. Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

Personal Protective Equipment (PPE)

The registrant has PPE listed on the label, however, what is described on the label is not acceptable. Please note that OSHA has jurisdiction for PPE in the manufacturing settings. However, if they want to put PPE on their label then for the Agency it would have to read as follows:

“Wear a minimum of a NIOSH-approved particulate filtering facepiece respirator with any N, R, or P filter; OR a NIOSH approved elastomeric particulate respirator with any N, R, or P filter; OR a NIOSH-approved powered air purifying respirator with HE filters;

long sleeved shirt; long pants; shoes; socks; and chemical resistant gloves made out of:
barrier laminate, butyl rubber ≥ 14 mils, nitril rubber ≥ 14 mils, neoprene rubber ≥ 14 mils,
natural rubber ≥ 14 mils, polyethylene, polyvinyl chloride ≥ 14 mils, viton ≥ 14 mils.”